

STATE OF NEW HAMPSHIRE

Inter-Department Communication

NHPUC 13JUN17PM4:00

DATE: June 13, 2017
AT (OFFICE): NHPUC



FROM: David Goyette, Utility Analyst III

SUBJECT: DM 17-073, EDF Energy Services, LLC
Renewal of Registration as Competitive Electric Power Supplier

TO: Commissioners
Debra Howland, Executive Director

Executive Summary

EDF Energy has applied to renew its registration as a competitive electric power supplier. EDF Energy's current registration expires on June 30, 2017. EDF Energy submitted certificates demonstrating it completed EDI testing with Eversource, Liberty, and Unitil, a copy of a provision in its current letter of credit that shows that the LOC, which is in the amount of \$100,000, is automatically extended by one year, and a request for a waiver of the five-year and 90-day term requirement for financial security. If the Commission were to grant the requested rule waiver, Staff believes the filing is acceptable. Staff recommends the Commission grant the waiver and approve the application for a registration period ending on the termination date of the LOC as extended.

Background and Analysis

On May 1, 2017, EDF Energy Services, LLC (EDF Energy) filed an application to renew its registration as a competitive electric power supplier (CEPS). EDF Energy's currently active registration, which the Commission approved in Docket DM 16-628, expires on June 30, 2017. EDF Energy's application included certificates demonstrating that it has completed electronic data interchange (EDI) testing with Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (Liberty), and Unitil Energy Systems, Inc. (Unitil), evidence that it is able to obtain supply in the New England energy market, and a copy of a provision in its currently effective letter of credit (LOC) that automatically extends the term of the LOC by one year, to June 30, 2018. The LOC is in the amount of \$100,000 and names the Commission as beneficiary. On May 8, 2017, EDF Energy filed a request for a waiver of Puc 2003.03(a)(5), which requires the financial security filed with a renewal application have a term of five years and 90 days.

Staff has reviewed the information in the application and, if the Commission were to grant approval of the waiver request of the financial security term requirement, believes it meets the requirements of Puc 2003 and 2006.01. Staff recommends that the

Commission grant the request for a waiver and, because the LOC does not meet the five-year and 90-day term requirement and because it expires on June 30, 2018, that the Commission approve a registration period concurrent with the term of the LOC, beginning on the expiration date of the currently active registration, June 30, 2017, and ending at the close of business on June 30, 2018.

Staff also recommends that the Commission notify EDF Energy that the financial security rules are likely to change during 2017 and that EDF Energy should monitor the rulemaking process in Docket DRM 16-853 and plan accordingly with respect to future operations in New Hampshire.

EDF Energy filed documentation that demonstrates it has completed EDI testing with Eversource, Liberty, and Unitil. Staff therefore recommends that the Commission approve EDF Energy's application to renew its registration as a CEPS, and that it permit EDF Energy to serve only large commercial and industrial customers and to operate in the service areas of Eversource, Liberty, and Unitil.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.

c) Serve a written copy on each person on the service list not able to receive electronic mail.